REMARKS

Claim 12 is pending in this application. By this Amendment, claim 12 is amended. No new matter is added by this amendment. Reconsideration of the application based upon the above amendments and the following remarks is respectfully requested.

The Office Action, on page 2, rejects claim 12 under 35 U.S.C. §112, second paragraph, as being indefinite. Specifically, the Office Action indicates that the "when" conditions are construed independently rendering the "first position" and "second position" features unrelated throughout the claim. Claim 12 is amended to eliminate the "when" conditions and to further clarify the claim language.

Accordingly, reconsideration and withdrawal of the rejection of claim 12 under 35 U.S.C. §112, second paragraph, are respectfully requested.

The Office Action, on page 2, rejects claim 12 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application Publication No. US 2003/0020729 B2 to Toji et al. (hereinafter "Toji"). This rejection is respectfully traversed.

Claim 12 recites, among other features, separately analyzing character pixel configurations. The Office Action asserts, on page 2, that Toji teaches this feature. In support of this assertion, the Office Action cites paragraph [0182] of Toji. The Office Action, however, interprets the disclosure of Toji too broadly. Toji teaches comparing 3 x 3 pixel configurations around a target cell (bitmap patterns) with a library of 256 possible 3 x 3, or 8-pixel, configurations (reference patterns) (see paragraphs [0181]-[0182]). Thus, for each bitmap pattern, Toji must reference the library in order to match that bitmap pattern with its appropriate reference pattern in the library. Based on an accurate match, Toji assigns sub-pixel combinations to the target cell. Although this process is repeated for each target cell, it is unreasonable to assert that the disclosure of Toji analyzes each pixel separately. Toji's target cell merely labels the bitmap pattern. Then, after identifying a labeled bitmap, Toji's

analysis is necessarily limited to matching 8-pixel bitmap patterns to 8-pixel reference patterns and not individual target pixels.

Claim 12 also recites a logical step-wise analytical approach effectuated by determination units. The Office Action asserts, throughout, that Toji teaches this feature. The limitations of the Toji analysis are, in part, as set forth above. Further to those limitations, Toji also fails to teach determination units and analytical steps operating systematically according to the cell-by-cell analysis recited in claim 12. Toji, in fact, merely teaches a pattern-determining unit and a pattern-correcting unit for making the bitmap/reference comparisons and assigning sub-pixel patterns (see paragraphs [0037]-[0039]). These patterning units, however, are limited to comparing and assigning patterns and do not teach, nor would they have suggested, among other features, the negative determination capacity of the determination units recited in claim 12. Toji's shortfalls in this regard limit the capacity of Toji to efficiently execute a target cell analysis by eliminating steps according to the quality of adjacent cells.

The Office Action further asserts, on pages 5 and 6, that because Toji successfully reduces aliasing of the character "A", it is superior to the invention recited in claim 12. Applicant regards the Office Action's distinction between inferior and superior processes as a concession that the process recited in claim 12 is distinct and different from Toji. Indeed, the limitations of Toji set forth above render the Toji process materially different and materially insufficient compared to the process recited in claim 12. Furthermore, the Office Action's subjective preference regarding an arbitrary aliasing measurement by no means confirms, or even suggests, that in all circumstances, Toji's process would always reduce aliasing over the claimed invention or be a superior process generally. Toji's process is necessarily a more burdensome procedure. Toji requires searching a library of reference patterns for each bitmap

configuration corresponding to a target cell, which requires substantial processing. This limitation is clearly overcome by the features recited in claim 12.

Based on the foregoing, Toji cannot reasonably be considered to teach, or to have suggested, the combination of all of the features recited in claim 12.

Accordingly, reconsideration and withdrawal of the rejection of claim 12 under 35 U.S.C. §102(e) as being anticipated by Toji are respectively requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claim 12 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

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JAO:CJW/axl

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